

Stip terms outside plan
confirmation 8/6/2019

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Fran A. Rosenstock aka Fran A. Engelbach
Debtor

CHAPTER 13

Toyota Motor Credit Corporation
Movant

vs.

NO. 19-10625 ELF

Fran A. Rosenstock aka Fran A. Engelbach
Debtor

William C. Miller Esq.

Trustee

11 U.S.C. Section 362

STIPULATION

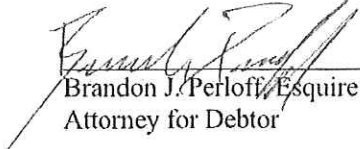
AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearages referenced in the motion have been cured, and Debtor(s) is/are current on post-petition loan payments through April 26, 2019.
2. Debtor(s) shall make the May 26, 2019 payment in the amount of \$552.26 by June 25, 2019;
3. Debtor(s) shall maintain post-petition contractual monthly loan payments due to Movant going forward, beginning with the payment due June 26, 2019 in the amount of \$552.26.
4. In the event that the payments under Section 2 above are not tendered, the Movant shall notify Debtor(s) and Debtor(s) attorney of the default in writing and the Debtor(s) may cure said default within FIFTEEN (15) days of the date of said notice. If Debtor(s) should fail to cure the default within fifteen (15) days, the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting the Movant relief from the automatic stay.
5. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.
6. The provisions of this stipulation do not constitute a waiver by the Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the vehicle and applicable law.


Date: June 12, 2019

By: /s/ Rebecca A. Solarz, Esquire
Attorney for Movant

Date: 6/27/2019


Brandon J. Perloff, Esquire
Attorney for Debtor

Date: 6/26/19


William C. Miller, Esquire
Chapter 13 Trustee

NO OBJECTION
*without prejudice to any
trustee rights and remedies.

Approved by the Court this _____ day of _____, 2019. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Eric L. Frank